



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



275702

SEP 27 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO ATTENTION OF
5HS-11

Clarke's Sanitary Fill
c/o Martin Clarke
2040 East Kemper Road
Sharonville, Ohio 45241

Re: **GENERAL NOTICE OF LIABILITY AND INFORMATION REQUEST**
Skinner Landfill
West Chester, Ohio

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the Skinner Landfill site. A Remedial Investigation (RI) and Feasibility Study (FS) was initiated at the Site in August 1985 pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCLA).

The U.S. EPA has spent, and will continue to spend, public funds to investigate releases or threatened releases of hazardous substances at the Site. Such action is being taken by U.S. EPA pursuant to Section 104 of CERCLA. The RI report describes findings on the nature and extent of contamination at the Site. The FS report, which will consider alternatives necessary to address the conditions at the Site, is projected to be released in August 1991. A Proposed Plan for appropriate remedial action at the Site will be made available by U.S. EPA, in consultation with the Ohio Environmental Protection Agency (OEPA), at that time. After expiration of the public comment period following the release of the Proposed Plan, the Regional Administrator will issue a Record of Decision (ROD) which will select the appropriate remedial action to be completed at the Site.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy are available for your inspection at the Region V offices located at

230 South Dearborn, Chicago, Illinois, 60604 and at the Union Township Public Library, 7900 Cox Road, West Chester, Ohio, 45069.

Additional Response Actions

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- (1) Design and implementation of the remedial action selected and approved by U.S. EPA and the OEPA for the Site; and
- (2) Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition to those enumerated above, U.S. EPA may, pursuant to its authorities under CERCLA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

Unless the U.S. EPA determines that a potentially responsible party (PRP) or group of PRPs will voluntarily undertake the remedial action necessary at the Site, U.S. EPA is authorized by Section 104 of CERCLA to undertake the remedial action itself. Under Section 107 of CERCLA, the U.S. EPA will seek reimbursement from PRPs of all costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response, and enforcement activities. Moreover, under Section 106 of CERCLA, U.S. EPA may order PRPs to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare, or environment, should those PRPs decline to voluntarily undertake remedial action at the Site.

PRP Determination

Responsible parties at the Skinner Landfill, under Section 107 of CERCLA, include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, persons or companies who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances and persons or companies who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter.

Since you are a generator of hazardous waste disposed of at the Site, the U.S. EPA has determined, and by this letter is notifying you, that you are a PRP with respect to the Site. The source(s) of this information are briefly summarized in Paragraph 1 of Attachment A to this letter.

Information Request

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, and pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6927, you are hereby requested to respond to the Information Requests enclosed as Attachment B. Compliance with the enclosed Information Requests is mandatory. Failure to respond fully and truthfully to each and every Information Request within twenty-one (21) days of receipt of this letter, or to adequately justify such failure to respond, can result in enforcement action by U.S. EPA pursuant to Section 3008 of RCRA under which U.S. EPA may seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance, and/or pursuant to Section 104(e)(5) of CERCLA which, as amended, authorizes the United States to seek penalties from a Federal court of up to \$25,000 for each day of continued non-compliance. "Non-compliance" is considered by U.S. EPA to be not only failure to respond to the Requests but also failure to respond completely and truthfully to each Request. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties of up to ten thousand dollars (\$10,000) or up to five (5) years of imprisonment or both under 18 U.S.C. 1001.

The United States Environmental Protection Agency has the authority to use the information requested herein in an administrative, civil or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

This information should be sent to:

Paul J. Rogers, (5HSM-TUB-7)
Superfund Program Management Branch
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

GENERAL NOTICE

Pursuant to its authority under Section 104(a) of CERCLA, the U.S. EPA is therefore issuing this General Notice to notify you of potential liability which you may have incurred with respect to the Site. This letter provides you an opportunity to enter into negotiations to reimburse the U.S. EPA for costs incurred to date at the Site and to voluntarily undertake the completion of any future remedial action. Since a RI/FS is currently on-going at the Site, special notice procedures pursuant to Section 122(e) of

CERCLA are not being used at this time. Special notice procedures may be used in the future, however, before the initiation of remedial action at the facility. The U.S. EPA will determine if a moratorium period for formal negotiations as set forth in Section 122(e) would facilitate an agreement between the PRPs, the OEPA, and the U.S. EPA to expedite a PRP-lead remedial action.

Demand for Costs Incurred

As mentioned above, in accordance with CERCLA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. The cost to date of the response actions performed through U.S. EPA funding at the Site is at least \$1,000,000. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCLA and other laws. In accordance with Section 107(a) of CERCLA, demand is hereby made for payment of the amount specified above plus any and all interest authorized to be recovered under Section 107(a) or under any other provisions of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may accrue in regard to the Site.

PRP List

The U.S. EPA would like to encourage good faith negotiations between you and the Agency and among other PRPs for the Site. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of the names and addresses of any other PRPs to whom this or a similar notification is being or has been sent. This list is appended as Attachment C to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. In order to effectively negotiate a settlement, it is important for the PRPs to organize themselves and establish a Steering Committee.

Volumetric Ranking, Alternatives Array

Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), is not available at this time.

Initial PRP Meeting

The U.S. EPA would like to meet with all PRPs who have indicated that they are interested in negotiating a settlement with the U.S.

EPA. The primary purpose for the meeting is to initiate informal negotiations with the PRPs for the completion of future remedial actions at the Site and for reimbursement of costs incurred by the U.S. EPA. This meeting does not constitute the beginning of formal negotiations.

U.S. EPA Notification

As a PRP, you should notify the U.S. EPA in writing within 21 days of receipt of this letter of your willingness to perform or finance the activities described above. If the U.S. EPA does not receive a timely response, the U.S. EPA will assume that you do not wish to negotiate a resolution of your potential responsibility in connection with the Site and that you have declined any involvement in performing the response activities.

The response should indicate the appropriate names, addresses, and telephone numbers for further contact with your representatives. If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of the response to any other parties involved in those discussions or actions. The response letter should be sent to:

Sheila Sullivan (5HS-11)
U.S. Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

-and-

John Breslin (5CS-TUB-7)
U.S. Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

Natural Resource Trustee Notification

By a copy of this letter, the U.S. EPA is notifying the State of Ohio and the Natural Resources Trustees, in accordance with Section 122(j) of CERCLA, of the Agency's intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

Further Information

If you need further information regarding this letter, you may contact Sheila Sullivan, Project Manager, at (312) 886-5251. If you have an attorney handling your legal matters, please direct his or her questions to John Breslin, Assistant Regional Counsel, at (312) 886-7165. If you have any questions concerning the information request section of this letter, please direct such questions to Paul J. Rogers at (312) 353-8069. It should be noted that the factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final Agency position on any matter set forth herein.

The U.S. EPA strongly encourages you to take immediate steps to organize into a Committee or Committees to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,



Richard Karl, Acting Chief
Remedial and Enforcement Response Branch

Enclosures

cc (Letter and all Attachments):
Sheila Huff, U.S. DOI
Cheryl Roberto
Kathy Davidson, OEPA
State Natural Resources Trustee

bcc: John Breslin
Sheila Sullivan
Office of Enforcement and Compliance Monitoring
Mark Lehar, OEPA (SWDO)
DOJ
Tai-Ming Chang, OWPE

ATTACHMENT A

1. The U.S. EPA has evaluated a large body of evidence in connection with its investigation of the Site, that includes site records, Butler County Health Department correspondence, court testimony for complaints filed against the owner/operator of the Skinner Landfill, and interviews and/or depositions of witnesses familiar with the disposal of waste at the site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site. Attached are copies of documents evidencing your involvement with the site.

Specifically, U.S. EPA has reason to believe that you did, by contract, agreement, or otherwise, arrange for the disposal, treatment, or transportation for disposal or treatment of hazardous substances found at the facility.

2. The U.S. EPA has conducted or is conducting the following studies and/or activities at the site:
 - a. Remedial Investigations to identify the local characteristics of the Site and to define the nature and extent of soil, air, surface water and ground water contamination at the Site. A phase 1 RI and phase 2 RI report is currently available.
 - b. Feasibility Studies to evaluate the feasibility of possible remedial actions to remove or contain hazardous substances, pollutants, and contaminants at the Site.

ATTACHMENT B

Request for Information

INSTRUCTIONS

1. A separate response must be made to each of the questions set forth in this Information Request.
2. Precede each answer with the number of the Information Request to which it corresponds.
3. In answering each Information Request, identify all contributing sources of information.
4. If information is not known or is not available to the Respondent as of the date of submission of his/her response, and should information later become known by or available to the Respondent, Respondent must supplement his/her response to U.S. EPA. Moreover, should the Respondent find, at any time after the submission of his/her response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify U.S. EPA thereof as soon as possible.
5. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
6. You must respond to the Information Requests on the basis of all information and documents in your possession, custody or control or in the possession, custody or control of your former or current employees, agents, servants, contractors or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge, and regardless of source.
7. Your response should be accompanied by a notarized affidavit from a responsible company official or representative stating that a diligent record search has been completed and that there has been a diligent interviewing process with present and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal or other handling practices of the Respondent between 1950 and 1991. To the extent that any information you provide relating to these Requests is based on your personal knowledge, or the personal knowledge of your employees, agents, or other representatives, this information shall be in the form of a notarized affidavit.
8. If any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, identify each such document, identify the person

to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.

9. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36902 et seq. (September 1, 1976); 43 Federal Register 4000 et seq. (September 8, 1978); 50 Federal Register 51654 et seq. (December 18, 1985).] If no such claim accompanies the information when it is received by the U.S. EPA, it may be made available to the public by the U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA.
10. U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

Definitions

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, partners, successors, assigns, subsidiaries and agents.
2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. "The Site" or "the Facility" shall mean and include the property on or about the Skinner Landfill, 3750 Cincinnati-Dayton Road, West Chester, Ohio.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances including petroleum products.
5. The term, "pollutant" or "contaminant", shall have the same definition as that contained in Section 101(33) of CERCLA, and

includes any mixtures of such pollutants and contaminants with any other substances.

6. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
7. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to all hazardous substances, pollutants and contaminants, hazardous wastes, solid wastes, as defined above.
9. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
10. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
11. The terms, "furnish", "describe", or "identify" or "indicate", shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.
12. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
13. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
14. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

15. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
16. "Transaction" or "Transact" means every separate act, deal, instance, occurrence, sale, transfer, giving, delivery, change in ownership, or change in possession.
17. As used herein, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
18. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these information requests any information which might otherwise be construed to be outside their scope.
19. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
20. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Part 260-280, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUESTS

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Requests or who may be able to provide additional responsive documents, identify such persons.
4. List the EPA Identification Numbers of the Respondent.
5. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous materials at your facility.
6. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site. In addition, identify the following:
 - a) The persons with whom you or such other persons made such arrangements;
 - b) Every date on which such arrangements took place;
 - c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;
 - d) The owner of the waste materials or hazardous substances so accepted or transported;
 - e) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
 - f) All tests, analyses, and analytical results concerning the waste materials;
 - g) The persons(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;

- h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
 - i) Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
 - j) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;
 - k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
 - l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
 - m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substance involved in each transaction.
 - n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
 - o) The price paid for (i) transport (ii) disposal or (iii) both of each waste material and hazardous substance.
 - p) All documents containing information responsive to a - o above or in lieu of identification of all relevant documents, provide copies of all such documents.
 - q) All persons with knowledge, information, or documents responsive to a - p above.
7. Provide a list of any hazardous waste produced as a result of the manufacturing processes employed at your facility, any chemical substances which become byproducts of the manufacturing process, the chemical composition of any sludges or liquids or other production wastes resulting from the manufacturing process. Summarize in a short narrative the equipment used to treat such waste materials, transport such waste materials or dispose of such waste materials.
8. If not fully identified in response to request number 6 above, identify all transporters and waste disposal firms used to dispose of waste materials generated by Respondent's facilities in the greater Cincinnati area during the period 1950 to 1991, the location to which this material was

transported and the person(s) responsible for selecting the disposal site.

9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.
10. If Respondent is a Corporation, respond to the following requests:
 - a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.
 - b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to those filed with the Internal Revenue Service.
 - c) Identify the Parent Corporation and all subsidiaries of the Respondent.
 - d) If Respondent has had any changes in corporate name, ownership or structure or has obtained an interest in or dissolved itself of an interest in any other corporation, subsidiary, division or other entity identify each such transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets and submit all documents relating to such transaction including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
11. If Respondent is a Partnership, provide copies of the Partnership Agreement.
12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

POTENTIALLY RESPONSIBLE PARTIES

(As of 8/27/91)

Skinner Landfill Site
West Chester, Ohio

Aeronca, Inc.
David Caudill
1712 Germantown Road
Middletown, Ohio 45042-9983

David E. Northrop
Samuels & Northrop Co., LPA
180 E. Broad St., Suite 816
Columbus, OH 43215

American Cyanamid Co.
Linda Doucette-Ashman
One Cyanamid Plaza
Wayne, NJ 07470

Borden, Inc.
Martha E. Horvitz
Environmental Counsel
180 East Broad Street
Columbus, Ohio 43215-3799

Carstab Inc.
Attn: Law Department
1560 West Street
Cincinnati, OH 45215

Chemical Leaman Tank Lines, Inc.
John J. Kilcullen
President and CEO
102 Pickering Way
Exton, PA 19341-0200

Steve Oster
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Steeet, NW
Washington, DC 20036-3384

Cincinnati Enquirer
617 Vine Street
Cincinnati, OH 45202

Donald A. Lane
Keating, Muething &
Klekamp
1800 Provident Tower
One East Fourth St.
Cincinnati, OH 45202

Cincinnati Milacron Inc.
Wayne Taylor
V.P. General Counsel and Secretary
4701 Marburg Ave
Cincinnati, OH 45209

Clarke's Sanitary Fill
2040 Kemper Rd.
Sharonville, OH 45241

POTENTIALLY RESPONSIBLE PARTIES

(As of 8/27/91)
Skinner Landfill Site
West Chester, Ohio

Dow Chemical Company
Peter M. Jennings
Legal Department
2030 Willard H. Dow Center
Midland, Michigan 48640

Elsa Skinner Morgan
8750 Cincinnati-Dayton Road
West Chester, Ohio 45069

Timothy R. Evans
Holbrock and Johnson
Holbrock and Johnson
Building
Monument at Ludlow
Hamilton, Ohio 45011

Erving Paper Mills
(Fox Paper Co.)
Mr. Charles B. Housen, CEO
Arch Street
Erving, MA 01344

Ford Motor Company
Timothy A. Green
Office of the General Counsel
Suite 401, Parklane Towers West
One Parklane Boulevard
Dearborn, Michigan 48126

Formica Corporation
Attn: Thomas H. Cifelli
Associate Counsel
155 Route 46 West, CN-980
Wayne, NJ 07474-0980

General Electric Aircraft Engines
General Electric Company
William V. Killoran, Jr.
1000 Western Ave.
Lynn, MA 01910

Georgia-Pacific Corp. (Label Division)
Marilyn B. Baucom
133 Peachtree St. N.E.
P.O. Box 105605
Atlanta, GA 30348

POTENTIALLY RESPONSIBLE PARTIES

(As of 8/27/91)
Skinner Landfill Site
West Chester, Ohio

Jiffy Packaging Co.
Attn: Law Department
Park 80 Plaza East
Saddlebrook, NJ 07662

Monsanto Company
ATTN: Stephen Krchma-E2NG
800 N. Lindberg Blvd.
St. Louis, MO 63167

Jerry K. Ronecker, Esq.
Husch & Eppenberger
100 N. Broadway
Suite 1300
St. Louis, MO 63102

Morton Thiokol, Inc.
Attn: Daniel Boone, Esq.
110 North Wacker Drive
Chicago, IL 60606-1560

Multi-Color Corp.
4575 Eastern Avenue
Cincinnati, OH 45226

Robert A. Bilott
Taft, Stettinius &
Hollister
1800 Star Bank Center
425 Walnut Street
Cincinnati, OH 45202-3957

Oxy Oil and Gas USA Inc.
(Cities Service Company--Levey Division)
Daniel R. Hale
Assistant General Counsel
110 W. 7th Street
Tulsa, OK 74119

PPG Industries, Inc.
Michelle Ritter
Law Dept., 39 West
One PPG Place
Pittsburgh, PA 15722

Velsicol Chemical Corporation
C/O A. Enrique Huerta
Resources Coordinator
Memphis Environmental Center
2603 Corporate Ave., Suite 100
Memphis, TN 38132

P 659 280 391

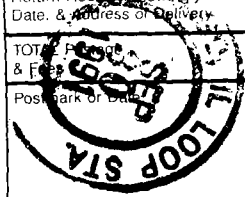
**Certified Mail Receipt**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Clarke's Sanitary Fill
c/o Dick Clark
9300 Cincinnati-Dayton Rd.
West Chester, Ohio 45241

Postage	\$ 1.21
Postage Due	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	1.00
TOTAL POSTAGE & FEES	\$ 3.21
Postmark or Date	

PS Form 3800, June 1990



ROGER SHSM-TU07

P 659 280 392

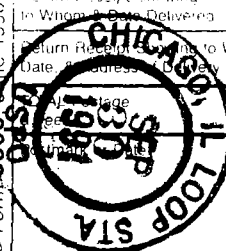
**Certified Mail Receipt**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Clarke's Sanitary Fill
c/o Martin Clarke
2040 East Kemper Road
Sharonville, Ohio 45241

Postage	\$ 1.67
Postage Due	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	1.00
TOTAL POSTAGE & FEES	\$ 3.67
Postmark or Date	

PS Form 3800, June 1990



ROGER SHSM-TU07

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN
CHICAGO, IL 60604

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

ASMT-7

260-10-11

Clarke's Sanitary ~~DEAD~~
c/o Martin Clarke
2040 East Kemper Road
Sharonville, OH 45241

RETURNED TO
REASON
CHECKED
Attempted Not known
Insufficient address
No such street
No such office in state
Do not re-mail in this envelope

P 659 280 392

Is your RETURN ADDRESS
completed on the reverse side?

ROGERS - SHSMA PUB-7

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery. (Extra charge)

3. Article Addressed to: Clarke's Sanitary Fill c/o Martin Clarke 2040 East Kemper Road Sharonville, Ohio 45241	4. Article Number P659 280 392 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X	
7. Date of Delivery	

PS Form 3811, Apr. 1989

U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

Thank you for using
Return Receipt Service.